

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

Case No. 16-CR-177

v.

TRAVIS M. KAMPS,

Defendant.

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**GOVERNMENT'S RESPONSE TO DEFENDANT'S REQUEST FOR  
COMPASSIONATE RELEASE**

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The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Daniel R. Humble, Assistant United States Attorney, respectfully submits its response to the defendant's motion for compassionate release as follows:

1. On April 21, 2017, this Court sentenced the defendant to 60 months of imprisonment, to be followed by five years of supervised release, for receipt of child pornography, in violation of Title 18 United States Code, Section 2252A(a)(2). The defendant is currently serving this sentence at the minimum-security federal correctional institution in Elkton, Ohio (Elkton FCI). Elkton has been identified as the BOP facility with the highest number of prisoner fatalities, nine deaths as of May 11, 2020. According to the Bureau of Prisons (BOP) website, the defendant's expected release date is October 27, 2021.

2. On May 4, 2020, the defendant filed a motion with this Court seeking compassionate release pursuant to 18 U.S.C. § 3582(b)(1)(A). In support of his motion, the defendant states that he suffers from numerous serious health issues, including hypertension, obesity, and kidney disease (Alport Syndrome). These health issues make him vulnerable to the effects of COVID-19 and raise a serious risk of death in the confined prison setting.
3. The defendant further states that on April 18, 2020, he submitted a request for compassionate release to the BOP and has yet to receive a response. The defendant has been identified as “medically vulnerable” by the BOP pursuant to an evaluation ordered by the District Court in the Northern District of Ohio. That court ordered that Kamps and other similarly situated prisoners be transferred to another BOP facility, released to home confinement, or released pursuant to any other method available to the warden. Based on a review of court filings in that case, the BOP has yet to comply with that court’s order.
4. The parties and the U.S. Probation office agree that Kamps was recommended for release to a Residential Reentry Center (halfway house) sometime in the late Summer or early Fall of 2020. As such, Kamps has already served approximately 70% and possibly as much as 90% of his confinement time. The defendant proposes that if he is released he will reside with his parents in Seymour, Wisconsin.
5. After a review of the defendant’s medical history, the circumstances particular to Elkton FCI, and the defendant’s approaching release date, the government has no objection to the defendant’s motion.

Respectfully submitted this 11<sup>th</sup> day of May, 2020.

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